

21 December 2016

RUGBY BOROUGH COUNCIL – DRAFT LOCAL PLAN

We are now halfway through the Second Consultation Period on the Draft Local Plan and I thought it was an appropriate moment to stop and consider how we have reached this *impasse*.

In essence, this Second Consultation is a response of Rugby Borough Council to the unprecedented level of objections to the inclusion of the Lodge Farm Village proposal in the Draft Local Plan. The Local Plan Preferred Options document (December 2015) received a total response of 280 comments. However, the Draft Local Plan (September 2016) received over 2000 comments during the first consultation. A significant majority of these comments related to the inclusion of the Lodge Farm Village proposal and were contributed not just from the people resident in the locality of Lodge Farm but from residents throughout the Borough and further afield. It is evident, therefore, that it is disagreement about the changes between the Preferred Options document and the Draft Local Plan that has brought about a Second Consultation.

The background and reasons for disagreement may be summarised as follows:-

1. As part of the Memorandum of Understanding, entered into by neighbouring authorities in Coventry and Warwickshire in September 2015, Rugby Borough agreed to provide for an additional 2800 homes in the Borough to meet Coventry's unmet housing need.
2. In its Preferred Options document, Rugby Borough Council agreed to allocate land at Walsgrave Hill Farm specifically to meet a significant part of this need. This document stated

"In consideration of the significant contribution other areas of the borough will be making to meeting Rugby's housing need and that the additional need is coming from Coventry, delivery on the edge of Coventry is a logical approach"

Furthermore, the document continues

"...the promotion of sustainable patterns of development that meet identified housing needs is an exceptional circumstance that can justify Green Belt release. In this specific location, the advantages of locating development that meet the unmet housing needs of the Coventry and Warwickshire housing market area, Coventry City specifically, are a further sufficiently exceptional circumstance to justify Green Belt release within Rugby Borough"

3. In March 2016, in response to a "call for land", the Lodge Farm site was submitted for consideration. In the subsequent Draft Local Plan, the Walsgrave Hill Farm site was excluded and the Lodge Farm site was included. The reasons for the exclusion of Walsgrave Hill Farm, apart from the opportunistic volunteering of the Lodge Farm site, were identified in the Housing Background Paper (September 2015) as
 - doubts about the deliverability of the essential road improvements
 - concerns about local ecology (SSSI) and heritage (Coombe Abbey)

- the requirement of the site promoters to include employment land
- meeting the exceptional circumstances for Green Belt release.

It is believed that these concerns have been adequately addressed in the submissions and representations of Oxalis Planning on behalf of the promoters, Roxhill. It should also be noted that the sustainability assessment of the Walsgrave Hill Farm site (S14075) shows it to be more sustainable than in the original assessment of the Lodge Farm site (S16046). Hence, the criterion provided for removal of a site from the Green Belt (at Paragraph 84 of the NPPF) is met.

4. SALFV believes that the Draft Local Plan does not provide adequately for the provision of the unmet housing needs of Coventry. This totals 2800 houses and is substantially more than the number of houses scheduled for construction in the Draft Local Plan in the **north-west** area of the borough. The NPPF supports development which “*facilitates the use of sustainable modes of transport*” and “*where the need to travel will be minimised*”. The proposed sites in the Draft Local Plan ostensibly fail these tests in respect of Coventry’s needs - being more than 5 miles from the City boundary (A46) as the crow flies and considerably further by road.
5. With regard specifically to Lodge Farm Village, SALFV believes that the site is neither sustainable nor deliverable. In relation to sustainability, the isolated and relatively remote location of the site is of paramount importance. It is remote from sites of employment, secondary schools, retail outlets and leisure facilities. Ownership of private vehicles would be essential as current public transport provision is minimal and an additional 1500 homes in the neighbourhood would fall far short of justifying significantly increased public transport. SALFV has made formal representations identifying how Lodge Farm Village fails to meet all 18 of Rugby’s sustainability objectives
6. With regard to deliverability, transport is the most basic aspect. There has been no relevant and specific transport assessment identifying the implications on traffic of the Lodge Farm Proposal. With no specific sites of employment for residents obvious, it must be assumed that residents would work at the same locations as the current residents of the surrounding villages. Effectively, this means that residents working in Rugby, Coventry and Daventry would use the A45; residents working at Southam, JLR (Gaydon) and DIRFT would use the country lanes. The problems of the A45 as a High Risk Crash Route and the pollution problems in Dunchurch are widely recognised. Major improvements to the A45 are required and the provision of the proposed Spine Road will only make a minimal contribution to alleviating the traffic problems caused by the Lodge Farm proposal. Just as important are the widening and upgrading of the country lanes in Warwickshire and Northamptonshire. Such improvements will change the environment of the surrounding villages and, of course, will require massive investment.
7. Apart from the road network, there is a total lack of infrastructure at the site. The proposal indicates the provision of a Primary School and a Medical facility (although these aspects are dependent on other agencies/organisations contributing). However, this is only the start. Additional investment will be required to provide water and electricity to the site, sewage facilities, flood protection measures (to alleviate the surface water run-off into the Rainsbrook) etc.
8. The funding and provision of the improvements to roads and other infrastructure will need to take place prior to the construction of any houses. The Spine Road –

regarded as being helpful to and essential for the Lodge Farm Village proposal in the Draft local Plan – is not scheduled for completion until 2025/2026 and yet the first houses at Lodge Farm are scheduled for completion in 2020. It is clear that the deliverability of the Lodge Farm proposal has not been properly thought through. What is clear is that the cost of providing the necessary infrastructure will be very high and this will have a significant effect upon the ability of the site to provide Affordable Housing. This point has been conceded by the Head of Growth and Investment of Rugby Borough Council.

9. In conclusion, SALFV continues to believe that Lodge Farm Village is neither sustainable nor deliverable. This belief has been reinforced by all the professional consultants and advisers with whom the Committee has discussed the proposal. They regard the proposal as being opportunistic, ill-conceived and wholly unrealistic and that the Sustainability Assessment has not been prepared on the basis of an objective assessment of the evidence.

May I take this opportunity of wishing you a Very Happy Christmas and a Peaceful New Year.

Yours sincerely

DAVID THOMPSON

Chairman
SALFV